

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

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State of Oklahoma,	)	
	)	<b>Case No. 4:05-cv-00329-GKF-PJC</b>
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Tyson Foods, Inc., et al.,	)	
	)	
Defendants.	)	
	)	

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**CARGILL, INC., AND CARGILL TURKEY PRODUCTION, LLC'S  
DEFENDANT SPECIFIC DEPOSITION DESIGNATIONS**

COME NOW Cargill, Inc., and Cargill Turkey Production, LLC (together, "Cargill Defendants"), pursuant to Local Rule 30.1(c), the Court's May 14, 2009 Scheduling Order (Dkt. 2049), and General Order 09-4, and hereby provide their deposition designations identifying relevant testimony that Defendants may offer as testimony at the trial of this matter.

The Cargill Defendants reserve their rights to use any portion of a transcript, even if not designated, for the purposes of contradicting or impeaching the testimony of a deponent as a witness. The Cargill Defendants further reserve the right to withdraw all or part of these designations and to call one or more witnesses to testify at trial to supplement the testimony designated herein. The Cargill Defendants also reserve their rights to otherwise amend these deposition designations as the Court may deem appropriate.

The Cargill Defendants designate the following Deposition testimony:

Teena Gunter, August 27, 2008

<b>Start</b>	<b>Stop</b>
Pg. 6, ll. 7.	Pg. 6, ll. 22.

Teena Gunter, August 28, 2008

<b>Start</b>	<b>Stop</b>
Pg. <u>234</u> , ll. <u>2</u> .	Pg. <u>234</u> , ll. <u>25</u> .

Teena Gunter, October 29, 2008

<b>Start</b>	<b>Stop</b>
Pg. <u>32</u> , ll. <u>23</u> .	Pg. <u>33</u> , ll. <u>10</u> .
Pg. <u>33</u> , ll. <u>22</u> .	Pg. <u>34</u> , ll. <u>7</u> .
Pg. <u>98</u> , ll. <u>9</u> .	Pg. <u>99</u> , ll. <u>8</u> .
Pg. <u>100</u> , ll. <u>24</u> .	Pg. <u>101</u> , ll. <u>12</u> .
Pg. <u>107</u> , ll. <u>14</u> .	Pg. <u>110</u> , l. <u>10</u> .
Pg. <u>179</u> , ll. <u>1</u> .	Pg. <u>182</u> , ll. <u>5</u> .

Terry Peach, April 10, 2009

<b>Start</b>	<b>Stop</b>
Pg. 5, II. 12.	Pg. 7, II. 14.
Pg. 21, II. 1.	Pg. 22, II. 16.
Pg. 23, II. 4.	Pg. 23, II. 8.
Pg. 23, II. 10.	Pg. 23, II. 15.
Pg. 23, II. 17.	Pg. 24, II. 24.
Pg. 25, II. 1.	Pg. 25, II. 11.
Pg. 25, II. 13.	Pg. 26, II. 15.
Pg. 27, II. 13.	Pg. 28, II. 1.
Pg. 28, II. 3.	Pg. 29, II. 1.
Pg. 29, II. 13.	Pg. 29, II. 17.
Pg. 30, II. 5.	Pg. 35, II. 1.
Pg. 36, II. 18.	Pg. 36, II. 23.
Pg. 36, II. 25.	Pg. 37, II. 25.
Pg. 38, II. 2.	Pg. 38, II. 5.
Pg. 38, II. 8.	Pg. 38, II. 8.
Pg. 38, II. 19.	Pg. 38, II. 24.
Pg. 39, II. 1.	Pg. 40, II. 16.
Pg. 40, II. 19	Pg. 40, II. 22
Pg. 41, II. 12.	Pg. 41, II. 19.
Pg. 41, II. 21.	Pg. 42, II. 4.
Pg. 42, II. 7.	Pg. 42, II. 13.
Pg. 43, II. 1.	Pg. 43, II. 1.
Pg. 43, II. 21.	Pg. 45, II. 8.
Pg. 45, II. 10.	Pg. 45, II. 25.
Pg. 49, II. 2.	Pg. 49, II. 8.
Pg. 58, II. 8.	Pg. 58, II. 24.

Start	Stop
Pg. 59, II. 1.	Pg. 59, II. 1.
Pg. 59, II. 11.	Pg. 59, II. 15.
Pg. 59, II. 17.	Pg. 59, II. 20.
Pg. 60, II. 23.	Pg. 61, II. 1.
Pg. 61, II. 3.	Pg. 61, II. 6.
Pg. 61, II. 8.	Pg. 61, II. 17.
Pg. 61, II. 25.	Pg. 62, II. 3.
Pg. 62, II. 8.	Pg. 62, II. 8.
Pg. 62, II. 15.	Pg. 63, II. 4.
Pg. 63, II. 6.	Pg. 63, II. 12.
Pg. 63, II. 14.	Pg. 63, II. 21.
Pg. 63, II. 23.	Pg. 63, II. 25.
Pg. 64, II. 7.	Pg. 64, II. 10.
Pg. 64, II. 12.	Pg. 64, II. 13.
Pg. 64, II. 16.	Pg. 65, II. 1.
Pg. 65, II. 3.	Pg. 65, II. 12.
Pg. 65, II. 14	Pg. 65, II. 14.
Pg. 65, II. 16.	Pg. 65, II. 19.
Pg. 66, II. 2.	Pg. 66, II. 6.
Pg. 66, II. 8.	Pg. 66, II. 16.
Pg. 66, II. 18.	Pg. 66, II. 23.
Pg. 66, II. 25.	Pg. 66, II. 25.
Pg. 67, II. 24.	Pg. 68, II. 4.
Pg. 68, II. 6.	Pg. 68, II. 24.
Pg. 69, II. 1.	Pg. 69, II. 5.
Pg. 69, II. 7.	Pg. 69, II. 10.
Pg. 69, II. 13.	Pg. 69, II. 21.
Pg. 69, II. 23.	Pg. 70, II. 12.
Pg. 70, II. 14.	Pg. 70, II. 14.
Pg. 71, II. 5.	Pg. 71, II. 7.
Pg. 71, II. 9.	Pg. 71, II. 10.
Pg. 71, II. 12.	Pg. 71, II. 15.
Pg. 71, II. 17.	Pg. 71, II. 17.
Pg. 71, II. 24.	Pg. 72, II. 1.
Pg. 72, II. 3.	Pg. 72, II. 3.
Pg. 72, II. 8.	Pg. 73, II. 3.
Pg. 73, II. 5.	Pg. 73, II. 12.
Pg. 73, II. 14.	Pg. 73, II. 23.
Pg. 73, II. 25.	Pg. 74, II. 5.
Pg. 74, II. 7.	Pg. 74, II. 12.
Pg. 74, II. 14.	Pg. 75, II. 4.
Pg. 75, II. 6.	Pg. 75, II. 10.
Pg. 75, II. 12.	Pg. 75, II. 14.
Pg. 75, II. 16.	Pg. 76, II. 2.

Start	Stop
Pg. 76, II. 4.	Pg. 76, II. 13.
Pg. 76, II. 15.	Pg. 76, II. 23.
Pg. 76, II. 25.	Pg. 78, II. 9.
Pg. 78, II. 16.	Pg. 78, II. 19.
Pg. 78, II. 21.	Pg. 79, II. 9.
Pg. 79, II. 11.	Pg. 79, II. 15.
Pg. 79, II. 17.	Pg. 79, II. 19.
Pg. 79, II. 24.	Pg. 80, II. 10.
Pg. 80, II. 12.	Pg. 80, II. 18
Pg. 81, II. 4.	Pg. 81, II. 6.
Pg. 81, II. 8.	Pg. 81, II. 9.
Pg. 81, II. 16.	Pg. 81, II. 20.
Pg. 81, II. 22.	Pg. 82, II. 4.
Pg. 82, II. 7.	Pg. 82, II. 11.
Pg. 82, II. 13.	Pg. 82, II. 19.
Pg. 85, II. 12.	Pg. 85, II. 15.
Pg. 85, II. 17.	Pg. 86, II. 2.
Pg. 86, II. 4.	Pg. 86, II. 4.
Pg. 86, II. 25.	Pg. 87, II. 4.
Pg. 87, II. 6.	Pg. 87, II. 8.
Pg. 87, II. 10.	Pg. 87, II. 13.
Pg. 87, II. 15.	Pg. 87, II. 23.
Pg. 87, II. 25.	Pg. 88, II. 5.
Pg. 88, II. 7.	Pg. 88, II. 10.
Pg. 88, II. 12.	Pg. 88, II. 14.
Pg. 88, II. 22.	Pg. 88, II. 24.
Pg. 89, II. 1.	Pg. 89, II. 6.
Pg. 89, II. 18.	Pg. 89, II. 20.
Pg. 89, II. 22.	Pg. 89, II. 25.
Pg. 89, II. 2.	Pg. 89, II. 2.
Pg. 91, II. 7.	Pg. 91, II. 15.
Pg. 91, II. 17.	Pg. 91, II. 19.
Pg. 91, II. 21.	Pg. 91, II. 24.
Pg. 92, II. 1.	Pg. 92, II. 1.
Pg. 92, II. 7.	Pg. 92, II. 9.
Pg. 92, II. 11.	Pg. 92, II. 14.
Pg. 92, II. 16.	Pg. 92, II. 16.
Pg. 92, II. 25.	Pg. 93, II. 4.
Pg. 93, II. 6.	Pg. 93, II. 13.
Pg. 93, II. 15.	Pg. 93, II. 25.
Pg. 94, II. 2.	Pg. 94, II. 5.
Pg. 94, II. 7.	Pg. 94, II. 10.
Pg. 94, II. 12.	Pg. 94, II. 17
Pg. 94, II. 20.	Pg. 94, II. 21.

Start	Stop
Pg. 95, II. 1.	Pg. 95, II. 5.
Pg. 95, II. 7.	Pg. 95, II. 11.
Pg. 95, II. 13.	Pg. 95, II. 23.
Pg. 95, II. 25.	Pg. 96, II. 7.
Pg. 96, II. 10.	Pg. 96, II. 11.
Pg. 98, II. 21.	Pg. 100, II. 6.
Pg. 100, II. 9.	Pg. 100, II. 9.
Pg. 100, II. 16.	Pg. 101, II. 2.
Pg. 101, II. 4.	Pg. 101, II. 7.
Pg. 101, II. 9.	Pg. 101, II. 20.
Pg. 103, II. 1.	Pg. 103, II. 8.
Pg. 103, II. 10.	Pg. 103, II. 15.
Pg. 103, II. 17.	Pg. 103, II. 25.
Pg. 104, II. 2.	Pg. 104, II. 12.
Pg. 104, II. 14.	Pg. 104, II. 20.
Pg. 104, II. 22.	Pg. 105, II. 2.
Pg. 105, II. 7.	Pg. 105, II. 12.
Pg. 105, II. 14.	Pg. 105, II. 23
Pg. 105, II. 25.	Pg. 105, II. 25
Pg. 106, II. 2.	Pg. 106, II. 7.
Pg. 106, II. 12.	Pg. 106, II. 16.
Pg. 106, II. 21.	Pg. 107, II. 13.
Pg. 107, II. 23.	Pg. 108, II. 1.
Pg. 108, II. 3.	Pg. 108, II. 3.
Pg. 111, II. 25.	Pg. 112, II. 2.
Pg. 112, II. 6.	Pg. 112, II. 9.
Pg. 112, II. 12.	Pg. 112, II. 16.
Pg. 112, II. 21.	Pg. 112, II. 23.
Pg. 113, II. 2.	Pg. 113, II. 2.
Pg. 124, II. 8.	Pg. 127, II. 7.
Pg. 127, II. 10.	Pg. 128, II. 19.
Pg. 128, II. 24.	Pg. 129, II. 10.
Pg. 129, II. 12.	Pg. 129, II. 24.
Pg. 130, II. 2.	Pg. 130, II. 20.
Pg. 130, II. 22.	Pg. 131, II. 23.
Pg. 131, II. 25.	Pg. 132, II. 6.
Pg. 132, II. 16.	Pg. 133, II. 1.
Pg. 136, II. 11.	Pg. 137, II. 5.
Pg. 137, II. 18.	Pg. 137, II. 21.
Pg. 137, II. 23.	Pg. 138, II. 3.
Pg. 138, II. 5.	Pg. 138, II. 12.
Pg. 138, II. 22.	Pg. 140, II. 4.
Pg. 140, II. 6.	Pg. 140, II. 17.
Pg. 140, II. 19.	Pg. 140, II. 24.

<b>Start</b>	<b>Stop</b>
Pg. 141, II. 1.	Pg. 141, II. 6.
Pg. 141, II. 17.	Pg. 141, II. 21.
Pg. 141, II. 23.	Pg. 142, II. 2.
Pg. 142, II. 4.	Pg. 142, II. 8.
Pg. 142, II. 11.	Pg. 142, II. 12
Pg. 143, II. 1.	Pg. 143, II. 14.
Pg. 143, II. 16.	Pg. 143, II. 17.

The Cargill Defendants have provided Plaintiffs with a transcript including the noted designations and the same will be provided to the Court after Plaintiffs have identified their counter-designations, if any, and all objections have been noted.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on the 1st day of July, 2009, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

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